The Federal Communications Commission Washington, D.C. 20554

Subject: Comments Concerning RM-10870

Commissioners:

I respectfully submit the following comments concerning the proposal by the NCVEC, RM-10870, concerning restructuring of the Amateur Radio Service. I am an amateur radio operator and I hold an Amateur Extra class license. I urge the Commission to reject the proposal based on a number of reasons. It appears the NCVEC proposal:

1) Removes significant incentives for advancing the skills of amateur operators, 2) Will not result in any growth of the Amateur Radio Service, 3) Does not show any significant incentives for advancing the skills of the amateur operators, 4) Removes the demonstration of knowledge of the Morse Code (CW) skill for all classes.

The Amateur Radio Service is to be available with trained amateurs to serve in case of local and national emergencies. Yet the NCVEC proposal is asking that the FCC create a license structure that does not certify minimum skills from these amateurs that would be needed for these emergencies as stated in Part 97.1 d). With the reduced testing and automatic upgrades as proposed by the NCVEC, this will reduce the ability of future amateurs to respond in times of emergencies. Thus the NCVEC proposal is not in the best interest of the American public nor in the best interest of the Amateur Radio Service.

It is obvious that the proposal of the NCVEC does not indicate where there would be any incentive for advancement of skills. The entry level license as proposed by the NCVEC would be allotted almost half of the bandwidth of the 80 meter, 40 meter, 15 meter bands. Along with placing the licensee at the band edge on the phone portion of these bands which can cause problems for the licensee with limited operating experience and knowledge. This does not seem to encourage any need for upgrading to the next license level. This only keeps the mind set as it is today. Remain in the minimum license class until further reduction in requirements come and there is another automatic advancement.

The NCVEC also recommends that the entry level licensee be given almost 50% of the CW/Data spectrum of the 80 meter, 40 meter and 15 meter bands. Which will in turn create a number of issues as they again are inexperienced and lacking in knowledge of proper operating procedures.

The NCVEC proposes that all current Technician class licensees, including those with Morse (CW) credit to be automatically advanced to the General class license. This does not indicate any form of an incentive system nor does it encourage any increase in skills for this level of license. As such it tells those that are automatically advanced that there is no need to work towards the next level as there really is not much left to gain by doing so.

The NCVEC states that the Technician class license examination is too difficult for newcomers and causes them to abandon the thought of becoming an amateur radio operator. Yet they want to place those that have passed this same examination into a license class that requires even more skill and knowledge. This seems to be a contradiction. The advancement of the Technician class along with those with the Morse Code credit to the General class license without taking the Element 3 examination would not be in the best interest of the Amateur Radio Service nor to the American people.

The NCVEC states that the entry level Technician class license study material is too much to learn. That the only interest of the newcomer is to help and communicate. The newcomer is not interested in the technology of radio communications. It is not required that a newcomer build their own equipment. They are to be tested on some of the basic fundamentals of a radio. The commercially available radios that the newcomer will be purchasing has more options on them now then ten years ago. The newcomer should have knowledge of these newer options which they will certainly be exposed to once they are licensed. Without the knowledge of some of these circuits and their functions they will be using their equipment incorrectly and possibly create a problem once on the air.

The NCVEC wants to restrict the final stage of the newcomers radio to 30 volts DC and basically keep the newcomer from experimenting and gaining knowledge. If a newcomer is to gain knowledge of how a radio works and the proper way of adjusting the radio one would acquire a "vintage" or "legacy" radio. So the NCVEC is saying they are not in favor of the newcomer learning and prefer them to be an off the shelf operator. Again, this will reduce the number of experienced amateur operators in time of emergency.

The NCVEC states the entry level examination is too difficult for the newcomer, yet it is shown through the Volunteer Examiners that approximately 85% of the applicants pass the Technician examination. since the introduction of the Technician class license without a Morse Code requirement the number of entry level amateurs has increased dramatically. This would tend to indicate that the examination is not too difficult to newcomers to the Amateur Radio Service. If anything it is an indication that the examination is challenging enough that only those that seek to learn and embrace a challenge apply.

If there is a reduction in the requirements for obtaining a license for the Amateur Radio Service, there is no doubt there will be an increase in licensed amateurs. Just as there was an increase with the introduction of the Technician class without a Morse Code requirement. Yet the number of licensed amateur operators stays relatively constant for a quite a number of years.

With regards to the Morse Code testing the NCVEC requests complete removal of the Morse testing requirement. The NCVEC states that with the current changes there is no need to require such testing. Yet the figures show that about 10% of the ITU participating

countries have dropped the Morse Code testing. The former Soviet Union is still requiring Morse Code testing. This in of itself should be of concern to the FCC and the American public. If the FCC were to decide to drop the Morse testing the reciprocal licensing issues that would stem from this would cause problems down the road for some that wish to operate in some of the CET and IARP countries.

Morse Code (CW) is considered the most fundamental mode of communications. It serves better than voice and the digital modes under extremely noisy band conditions. It can be operated with the use of the most simplest of equipment. It serves as an international language, and is the second most popular mode of communications in amateur use. How can an amateur state that he/she has advanced skills and has become an expert and yet does not have the knowledge or skill to operate in the simplest mode of communication? The Morse Code (CW) requirement does not serve as a barrier as the NCVEC and others have stated. It is merely a test of ones skill, ability to advance their knowledge in a mode that is universal. It also serves as a mode of communications during emergencies when all modern forms of communications are lost, as in the case of NYC during 9/11. there was no internet in or out of the city. Cellular phones were down for a long time during this disaster.

I would like to make mention of the written examinations. This is a subject of great concern among many amateurs. The questions as well as the correct and incorrect answers are published. This leads to simply reading the questions and the correct answer over and over again prior to attending a test session. Which in turn means the individual has no real understanding of what the test covered in relation to operating skills or FCC regulations. Though the individual passes the examination there is still a lack of learning the material. Just the ability to recognize the correct answer at the VE session and not truly understand what is being asked of the applicant. Along with the reduction of questions the NCVEC would like the applicant for a new license not to be tested on RF safety. If the entry level licensee is to have some HF privileges then they should be made aware of and be tested on RF safety for their own as well as others safety.

The "dumbing down", as some call it, of the Amateur Radio Service has been quite obvious. As more and more Amateur Extra class amateurs are asking the most simplistic of questions that should have been learned if they had actually studied the material for each level of license. If these individuals were given stricter examinations that required them to learn the basics these questions would not be asked. These individuals would at the very least have taken it upon themselves to research and understand what it is they are trying to accomplish. This is the pool of amateur radio operators the NCVEC wishes to promote, not ones that have a grasp of the fundamentals of operating and of building the most simplest of antennas or equipment. In time of emergencies these operators would not help the American public but hinder in the efforts to set up emergency communications due to their lack of skill and knowledge.

I propose the Commission remove from publication the questions as well as the answers both correct and incorrect. This would force the newcomer or the amateur that wishes to upgrade to actually study the material and learn from what they have studied. I would be beneficial to the American public and to the Amateur Radio Service as a whole.

I will conclude my comment by recommending that the Commission reject the proposal submitted by the NCVEC, RM-10870. In general the proposal by the NCVEC only serves

to reduce not enhance the Amateur Radio Service.

Respectfully,

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